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JUN 22 1993

Mr. William Crumley, P.E.
Regional Landfill Compliance Manager
BFI of Ponce, Inc.
8607 Roberts Drive Suite 100
Atlanta, Georgia 30350

Re: BFI Ponce, Inc.
Ponce Municipal Landfill, Ponce, Puerto Rico
RCRA Permit No.: PRD980594709

Dear Mr. Crumley:

This is in response to the Eight Bi-monthly Progress Report submitted by BFI of Ponce, Inc. to the United States Environmental Protection Agency (EPA) on March 8, 1993. Enclosed please find our comments.

1. The first paragraph of page 3, in the Summary and Recommendations section of the report, states that "Since the Priority Pollutants semi-volatile organic compounds are not Subtitle D detection parameters, it is recommended that consideration be made to remove these parameters from the indicator parameter list. Removal of these compounds from the sampling list should not affect the groundwater monitoring program since, to date, sampling has not indicated the presence of these group of compounds." However, as we stated in our letter to you dated July 8, 1992 this recommendation will not be accepted at this moment because the limestone, geologic formations in the area could be causing slow migration of potential contaminants to the down gradient monitoring wells.
2. On the second paragraph of the Summary and Recommendations the report states that "The lack of any significant increasing concentration trend in the data suggests that too few samples have been collected to establish valid statistical prediction limits. Therefore, more groundwater data should be collected during future semi-annual sampling events before establishing statistical prediction limits." BFI of Ponce should submit to this office an explanation of why too few samples were collected to establish statistical prediction limits and how it plans to increase the groundwater data collection during future semi-annual sampling events to address this deficiency.

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If you or your staff have any question regarding this issue,
please contact Mr. Luis Negron, of my staff, at (212) 264-0994.

Sincerely yours,

Michael Poetzsch, P.E.
Chief, New Jersey/Caribbean Permits Section

Enclosure

bcc: Michael Poetzsch, 2AWM-HWF w/o encl. ✓
Luis Negron, 2AWM-HWF w/o encl.
Ernst Jabouin, 2AWM-HWF w/o encl.